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July 23, 2025

Via ECF

The Honorable Judith C. McCarthy United States Magistrate Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: United States v. Justine Ying
Case No.: 7:22-mj-03841-UA-4

Dear Judge McCarthy:

The undersigned has been appointed to represent Ms. Justine Ying in the above-captioned matter. The defendant, Justine Ying, respectfully moves, pursuant to 18 U.S.C. § 3145(a)(2), to amend the conditions of her release. Ms. Ying seeks an Order from the Court to permit her to travel to visit a friend in the Dallas area of Texas from July 27, 2025 through August 11, 2025. Additionally, Ms. Ying would like to take a day trip to Kansas from July 31, 2025 through August 1, 2025 during her stay in Texas.

In order to facilitate the defendant's request, the defendant will do the following:

1. Ms. Ying will travel by airplane from Florida to Texas on July 27, 2025, and will return to Florida on August 11, 2025.
2. Prior to traveling outside the Southern District of Florida, Ms. Ying agrees to provide her assigned probation officer with her travel itinerary (including details such as airline, flight number, departure, and arrival times), where she is staying in Texas and in Kansas, and with whom.
3. Upon returning to the Southern District of Florida, Ms. Ying will telephone her probation officer and indicate that she has returned.
4. United States Pretrial Services Officer Nelson Valenzuela from the Southern District of Florida has been contacted by Ms. Ying and the undersigned but has yet to respond regarding the request.

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5. United States Attorney Margaret Vasu indicated that the government does not object to the requested modification.

WHEREFORE, the defendant moves that the Court issue an Order permitting the defendant to travel with the advanced notification and approval of her United States Probation Officer, to visit Texas from July 27, 2025 through August 11, 2025, and to visit Kansas from July 31, 2025 through August 1, 2025, subject to the conditions imposed by her probation officer.

Respectfully Submitted

THE DEFENDANT,
Justine Ying

By: */s/ Bruce D. Koffsky*

Counsel for Ms. Ying subsequently notified the Court and counsel for the Government that Probation also does not object to Ms. Ying's travel request.

Accordingly, the application to modify Ms. Ying's conditions of release is GRANTED, subject to the requirements detailed above regarding communicating with Probation about her itinerary and her whereabouts.

Dated: July 24, 2025

SO ORDERED.



ANDREW E. KRAUSE
United States Magistrate Judge